

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
KATHLEEN DIAZ	:	VIOLATIONS:
	:	21 U.S.C. § 846 (conspiracy to possess
	:	with intent to distribute more than five
	:	kilograms of cocaine - 1 count)
	:	21 U.S.C. § 846 (attempted possession of
	:	more than five kilograms of cocaine with
	:	intent to distribute - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least on or about January 21, 2005 through on or about January 28, 2005, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

KATHLEEN DIAZ

conspired and agreed, together and with others known and unknown to the grand jury, knowingly and intentionally to possess with intent to distribute five kilograms or more of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant KATHLEEN DIAZ used her residence, located at 6037 Large Street in Philadelphia, Pennsylvania, as a location to receive a shipment of cocaine on behalf of a person known to the grand jury.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

3. On or about January 21, 2005, defendant KATHLEEN DIAZ spoke on the telephone with a person known to the grand jury (person #1) concerning a package of cocaine person #1 planned to mail to her Philadelphia residence.

4. On or about January 28, 2005, defendant KATHLEEN DIAZ personally accepted a package addressed to defendant DIAZ containing more than five kilograms of cocaine that had been mailed by person #1 to her residence at 6037 Large Street in Philadelphia.

5. On or about January 28, 2005, inside her residence at 6037 Large Street in Philadelphia, defendant KATHLEEN DIAZ attempted to possess more than five kilograms of cocaine.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 28, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KATHLEEN DIAZ

knowingly and intentionally attempted to possess with intent to distribute more than five kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846 and 841(a)(1), (b)(1)(A).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY